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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

LEVY PRODUCTION GROUP, LLC, a  
Nevada limited liability company,

Plaintiff,

v.

R&R PARTNERS, INC., a Nevada  
corporation; FARRA FOXDOG  
PRODUCTIONS, LLC; ROE  
CORPORATIONS 1-10; JOHN DOES 11-20,

Defendants.

Case No.: 2:22-cv-01261-JAD-DJA

**STIPULATION AND ~~PROPOSED~~  
ORDER TO EXTEND DISCOVERY  
DEADLINES**

**(THIRD REQUEST)**

Pursuant to Local Rules IA 6-1, LR 7-1 and 26-3, plaintiff Levy Production Group, LLC (“Plaintiff” or “LPG”) and defendants R&R Partners, Inc, (“R&R”) and Farra Foxdog Productions, LLC (“Farra Foxdog”) (together, “Defendants”) stipulate to extend the discovery deadlines set forth in the Stipulated Discovery Plan and Scheduling Order (ECF No. 21). The parties’ stipulation is supported by the following:

**I. Discovery Completed to Date.**

The parties have completed the following discovery:

- Plaintiff served its initial disclosures under Rule 26(a)(1) on March 3, 2023.
- Plaintiff served its initial document production on March 3, 2023.
- The parties held their Rule 26(f) conference on March 9, 2023.
- R&R served its initial disclosures under Rule 26(a)(1) on March 23, 2023.
- Farra Foxdog served its initial disclosures under Rule 26(a)(1) on April 3, 2023.
- Farra Foxdog served its initial document production on April 3, 2023.
- Plaintiff served its first set of Requests for Production to R&R on March 31, 2023.
- Plaintiff served its first set of Requests for Production to Farra Foxdog on March 31, 2023.
- R&R served its first set of Requests for Production and first set of Interrogatories to Plaintiff on April 4, 2023.
- Farra Foxdog responded to Plaintiff’s first set of Requests for Production and supplemented its document production on April 26, 2023.
- R&R responded to Plaintiff’s first set of Requests for Production on May 1, 2023.
- R&R served its initial document production on July 3, 2023.
- Plaintiff took the deposition of former employee of Defendant R&R /non-party Stanzie Dunn on July 28, 2023.
- Plaintiff served its second set of Requests for Production to R&R on August 2, 2023.
- Plaintiff took the deposition of current employee of Defendant R&R /non-party Don Turley on August 11, 2023.
- R&R responded to Plaintiff’s second set of Requests for Production on September 1, 2023.
- R&R produced additional, requested documents on September 14, 2023.

- 1 • R&R supplemented its production of documents on October 12, 2023.
- 2 • Plaintiff took the deposition of current employee of Defendant R&R Partners/non-party
- 3 Dennis Caldwell on December 1, 2023.
- 4 • The deposition of Yanick Dalhouse is scheduled to take place on December 12, 2023.

5 **II. Discovery that Remains to be Completed.**

6 Plaintiff intends to take the depositions of the following fact witnesses:

- 7 • Yanick Dalhouse;
- 8 • Vaitari Anderson;
- 9 • Danita Collazo;
- 10 • Gina Nelson;
- 11 • Defendant R&R Partners, Inc.'s 30(b)(6) representatives;
- 12 • David Farra;
- 13 • James Farra;
- 14 • Matt Brown; and
- 15 • Las Vegas Convention and Visitors Authority 30(b)(6) representatives.

16 Nothing herein shall constitute a waiver by Defendants of the 10-deposition limit set forth  
17 under Fed. R. Civ. P. 30(a)(2).

18 Defendants intend to take the depositions of the following fact witnesses:

- 19 • Mike Levy;
- 20 • Jacquie Gray; and
- 21 • Plaintiff's 30(b)(6) witness(es).

22 The parties further anticipate the need to depose each parties' respective expert witnesses.

23 The parties reserve the right to seek additional discovery.

24 **III. Reasons for Extension.**

25 Good cause supports the requested extension. The parties have been working diligently  
26 to complete discovery and take depositions before the current deadline. However, due to  
27 Plaintiff's attorney's hospitalization and illness during a time when several important depositions  
28 had been set, and other unforeseeable events, including various scheduling conflicts with

witnesses, several depositions that the parties expected to occur in late September and through October were continued to November and December 2023. Thereafter, several deponents became unavailable due to the Thanksgiving Holiday and other witnesses are unavailable because they are traveling or have other scheduling conflicts during the Winter Holidays and New Years. Moreover, pushing the remaining discovery into early 2024 is unlikely to resolve these scheduling issues because Plaintiff's counsel has two trials that are scheduled in the month of January.

Accordingly, rather than waiting until the cusp of the expiration of the current deadlines before requesting a revision of the case management order, the parties now jointly seek to extend the deadline for the close of discovery by approximately 60 days, from April 8, 2024, to June 10, 2024, and to adjust all case deadlines accordingly. This request is made in good faith and not for purposes of delay, and the parties believe that the additional time will result in a narrowing of the issues and reducing the time required for trial.

**IV. Proposed Schedule for Completing all Remaining Discovery.**

The parties propose the following extensions of deadlines:

| Event  | Current Date     | Parties' Stipulated Proposal |
|--|------------------|------------------------------|
| Discovery cutoff                               | April 8, 2024    | June 10, 2024                |
| Deadline for amending pleadings/adding parties | August 30, 2023  | <i>No Change</i>             |
| Expert disclosures                             | February 9, 2024 | April 12, 2024               |
| Rebuttal expert disclosure                     | March 8, 2024    | May 10, 2024                 |
| Dispositive motion deadline                    | May 14, 2024     | July 16, 2024                |
| Joint pretrial order                           | June 12, 2024    | August 14, 2024              |

**IT IS SO AGREED AND STIPULATED**

Dated this 6<sup>th</sup> day of December 2023.

/s/ Bradley L. Boone

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Attorneys for Defendant  
R&R PARTNERS, INC.

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10 **IT IS SO ORDERED:**

11 **DATED:** 12/8/2023

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13 DANIEL J. ALBRECHTS  
14 UNITED STATES MAGISTRATE JUDGE  
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